

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AKHMED GADZHIEVICH BILALOV, an individual,

Plaintiff,

Docket #: 20-Civ-09153(AT)(KNF)

- against-

HERMAN GREF, SBERBANK CIB USA, INC.

Defendants.

**DECLARATION OF IRINA SHPIGEL IN SUPPORT OF PLAINTIFF’S MOTION FOR
LEAVE TO FILE AN AMENDED COMPLAINT**

I, Irina Shpigel declare pursuant to 28 USC §1746 as follows:

1. I am a member of the law firm Shpigel & Associates, P.C., counsel for Plaintiff Akhmed Bilalov.

I make this Declaration in support of Plaintiff’s motion for leave to file an amended complaint (the “Motion”).

2. Annexed hereto as **Exhibit A** is a true and correct copy of the proposed Amended Complaint.
3. Annexed hereto as **Exhibit B** is a “redline copy” showing the changes between the First Amended Complaint and the proposed Second Amended Complaint.
4. The proposed Second Amended Complaint (hereinafter the “SAC”) adds Defendant Sberbank of Russia PJSC as a necessary party and Does 1-100. The proposed SAC deletes two causes of action and adds three additional Civil RICO causes of action pursuant to 18 USC §1962 (b),(c) and (d) ,

(new Counts II, III, IV) and one cause of action pursuant to 28 U.S.C. §1350 (new Count X).

5. Prior to making the instant motion and before Defendants answer was due in this action, counsel for Plaintiff and Defendants met and conferred via an exchange of pre-motion to dismiss letters. On the basis of the arguments raised by Defendants in their pre-motion letters, Plaintiff makes this motion for leave to amend the complaint to avoid motion practice.

I declare under perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: June 4, 2021

/s/Irina Shpigel
Irina Shpigel